



U.S. Department of Justice

United States Attorney
Southern District of New York

The Jacob K. Javits Federal Building
26 Federal Plaza
New York, New York 10278

October 10, 2024

BY ECF

Honorable Lewis A. Kaplan
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *United States v. Ryan Salame*, 22 Cr. 673 (LAK)

Dear Judge Kaplan:

The Government writes in opposition to defendant Ryan Salame's eleventh-hour request to continue by two months the date for his voluntary surrender to the Bureau of Prisons, currently scheduled for October 11, 2024.

Salame has not offered a compelling justification to continue his surrender date a second time. This Court granted a prior request by Salame to continue his self-surrender date by 45 days so that Salame would have time undergo what he described as "urgent and necessary medical treatment and surgery." (Dkt. 467). In that time, Salame appears to have substantially recovered. He attended a court conference on September 12, 2024, at which he appeared physically recovered and was more than capable of answering the Court's questions with no signs of drooling or slurred speech. He recently participated in a videotaped interview with Tucker Carlson, during which he similarly appears physically recovered and entirely unimpaired while answering questions.¹ While Salame has submitted a doctor's letter in support of his request, this time the outlined medical treatment—which follows already-completed necessary medical treatment and surgery—seems largely cosmetic and nonurgent. The letter does not explain why the outlined procedures could not be performed after Salame's release, even if not his or his doctor's preferred timeline.

Moreover, while the Government consented to Salame's prior request, that was before he submitted a false affidavit to this Court under penalty of perjury, and before he asserted at the September 12, 2024 conference that he had lied to the Court under oath. In his recent interview with Tucker Carlson, Salame repeated some of the same lies (about the Government threatening his loved ones and denying guilt of offenses for which he pleaded guilty under oath) that he put before the Court in his false affidavit and testimony. Under these circumstances, Salame has given the Government and this Court little reason to believe that his eleventh-hour request is being made based on a good-faith need for medical treatment, rather than to delay his prison sentence and

¹ <https://tuckercarlson.com/tucker-show-ryan-salame>.

continue to make false and misleading public statements apparently intended to undermine the integrity of these proceedings.

For these reasons, the Government opposes Salame's request, which this Court should deny.

Respectfully submitted,

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by: /s/ Danielle R. Sassoon
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cc: Defense Counsel (by ECF)